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F#. 2018R01812

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

21-MJ- 899

- against -

C O M P L A I N T

TRAVIS LINDSEY,  
also known as “NUTSPRACKER,”

(21 U.S.C. §§ 841(b)(1)(A)(viii)),  
846; 18 U.S.C. § 3551 et seq.)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ALLAN LIEFKE, being duly sworn, deposes and states that he is a Special Agent with the Drug Enforcement Administration, duly appointed according to law and acting as such.

On or about between August 27, 2018 and August 3, 2021, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant TRAVIS LINDSEY also known as “NUTSPRACKER,” together with others, did knowingly and intentionally distribute and possess with intent to distribute a controlled substance, which offense involved 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a), 841(b)(1)(A)(viii); Title 18, United States Code, Sections 2 and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. I am a Special Agent with the Drug Enforcement Administration ("DEA"). I have been a DEA Special Agent for approximately 10 years and am currently assigned to the New York Division. During my tenure with the DEA, I have participated in numerous investigations of drug trafficking organizations during which I have conducted physical and electronic surveillance, executed court-authorized search warrants, debriefed cooperating witnesses and victims, reviewed and analyzed numerous taped conversations of those engaged in illegal activity, monitored wiretapped conversations and reviewed line sheets prepared by wiretap monitors. Through my training, education and experience, I have become familiar with the manner in which drug trafficking schemes are carried out and the efforts of persons involved in each activity to avoid detection by law enforcement.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

Background Regarding Digital Currency and the Dark Web

3. Digital currency (also known as crypto-currency) is generally defined as an electronic-sourced unit of value that can be used as a substitute for fiat currency (i.e. currency created and regulated by a government). Digital currency exists entirely on the internet and is not stored in any physical form. Digital currency is not issued by any government, bank, or company and is instead generated and controlled through computer software operating on a decentralized peer-to-peer network. Digital currency is not illegal in the United States and may be used for legitimate financial transactions. However, digital currency is often used for conducting illegal transactions, such as the sale of controlled substances.

4. Bitcoin is a type of digital currency. Bitcoin payments are recorded in a public ledger called a blockchain that is maintained by peer-to-peer verification and is thus not maintained by a single administrator or entity. Individuals can acquire Bitcoins either by “mining” or by purchasing Bitcoins from other individuals. An individual can “mine” for Bitcoins by allowing his/her computing power to verify and record Bitcoin payments on a publicly accessible ledger called a “blockchain.” Individuals are rewarded for this by being given newly created Bitcoins.

5. An individual can send and receive Bitcoins through peer-to-peer digital transactions or by using a third-party broker. Such transactions can be done on any type of computer, including laptop computers, tablets, and cellular telephones.

6. Bitcoins can be stored in “wallets.” A digital wallet essentially stores the access code that allows an individual to conduct Bitcoin transactions on the blockchain. To access Bitcoins on the blockchain, an individual must use a public address (or “public

key”) and a private address (or “private key”). The public address can be analogized to an account number while the private key is like the password to access that account.

7. Even though the public addresses of those engaging in Bitcoin transactions are recorded on the blockchain, the true identities of the individuals or entities behind the public addresses are not recorded. If, however, a real individual or entity is linked to a public address, it would be possible to determine what transactions were conducted by that individual or entity.

8. Through the dark web or darknet – websites accessible only through encrypted means – individuals have established online marketplaces, such as Silk Road, AlphaBay, DreamMarket, Empire Market, Wall Street Market, Point/Tochka, and Berlusconi, for narcotics and other illegal items. These markets often only accept payment through digital currencies, such as Bitcoin. Accordingly, individuals intending to purchase illegal items on the dark web need to obtain Bitcoins. Conversely, individuals who have received Bitcoin as proceeds of illegal sales on the dark web need to sell their Bitcoin or convert them to fiat currency in order to spend the proceeds outside of the dark web. Such sales or exchanges of Bitcoin are often facilitated by peer-to-peer Bitcoin exchangers who advertise their services on websites designed to facilitate such transactions.

9. Dark websites such as Silk Road, AlphaBay, DreamMarket, Empire Market, Wall Street Market, Point/Tochka, and Berlusconi operate(d) on “The Onion Router” or “TOR” network. The TOR network is a special network of computers on the internet that is designed to conceal the true Internet Protocol (“IP”) addresses of the computers accessing the network, and, thereby, the locations and identities of the network’s users. TOR likewise enables websites to operate on the network in a way that conceals the

true IP addresses of the computer servers hosting the websites, which are referred to as “hidden services” on the TOR network. Such “hidden services” have complex web addresses, which are many times generated by a computer algorithm, ending in “.onion” and can only be access through specific web browser software designed to access the TOR network.

The DEA Identifies “NUTSPRACKER” as a Dark Web Narcotics Distributor

10. In 2018, the DEA began investigating narcotics traffickers operating on the dark web. The DEA identified narcotics vendors and contacted those vendors using various methods. The investigation monitored an online dark web marketplace, Wall Street Market, and identified a vendor on Wall Street Market named “NUTSPRACKER.” According to information obtained from NUTSPRACKER’s profile on Wall Street Market, NUTSPRACKER was a United States-based seller of heroin and methamphetamine.

NUTSPRACKER’s advertisement stated:

NUTSPRACKER is proud to offer the highest quality methamphetamine and black tar heroin available to you not only on Wallstreet Market, but in the United States, period. We won’t hype up our product like every other vendor on here, but instead let the quality speak for itself. If you’re tired of the same old bullshit from your current vendor, give us a shot. We guarantee to exceed your expectations.

NUTSPRACKER sources our product with an unmatched eye and demand for only the highest premium quality and aim to make that available to you for what you will find is among the most competitive offers around. It’s sent directly from a lab in Mexico straight into our hands with no stops in between. It doesn’t get any better than this. The purity of our product is likely foreign to most users, a rocky shard which finds balance with a smooth inhale, intoxicating exhale, and a rush so fucking overwhelming it’ll give you a stiff dick in a matter of seconds. Regardless of your tolerance, from the very first hit you will undoubtedly become Nutspracked.

11. NUTSPRACKER's listings page also touted his ability to ship items discretely throughout the United States. For example:

We offer discrete shipping throughout the US, employing the necessary precautions to ensure it's safe passage to your destination of choice. We take every aspect of our collective security with exceptional attention to detail.

...

Use only a current resident at an address which does not call attention to itself.

...

YOUR ORDER WILL BE REJECTED IF YOU DO NOT ENCRYPT THE ADDRESS!

12. Information obtained from Wall Street Market showed that NUTSPRACKER had been a vendor since October 2017. As of September 27, 2018, NUTSPRACKER had completed 132 heroin and/or methamphetamine transactions on the market and had a rating of 4.9 out of 5 stars. Some of these transactions are outlined below.

Undercover Narcotics Purchase on August 27, 2018

13. On or about August 27, 2018, DEA agents acting in an undercover capacity ("UCs") purchased 7 grams of heroin from NUTSPRACKER through the Wall Street Market site. Per NUTSPRACKER's instructions on the listing, the UCs provided a shipment address in New York, New York (the "Manhattan Address") for the heroin. Upon entering the order for the heroin, the UCs were given an identification number for the transaction and a trade address where Bitcoin should be sent as payment. The UCs were also told a price in Bitcoin based on the exchange rate at the time of the purchase. The UC then sent the Bitcoin via the escrow function on Wall Street Market as requested.

14. Later that day, the UCs purchased 7 grams of methamphetamine for \$181.50 from NUTSPRACKER through the Wall Street Market site. Per NUTSPRACKER's instructions on the listings, the UCs provided the Manhattan Address as the shipping address for the methamphetamine. Upon entering the order for the methamphetamine, the UCs were given an identification number for the transaction and a trade address where Bitcoin should be sent as payment. The UCs were also told a price in Bitcoin based on the exchange rate at the time of the purchase. The UCs then sent the Bitcoin via the escrow function on Wall Street Market, as requested.

15. On or about September 4, 2018, DEA agents received a package at the Manhattan Address (the "First Package"). The First Package had a return address of "Stephen Wolfe, 11580 Cohansey Rd, San Diego, CA 92131-3614." A search of the First Package revealed a false invoice on behalf of "Pacific Harvest" for health foods. A further search of the box revealed approximately 10 grams of a substance that tested positive for methamphetamine and approximately 10 grams of a substance that tested positive for methamphetamine.

Undercover Narcotics Purchases on September 12, 2018

16. On or about September 12, 2018, the UCs purchased 28 grams of methamphetamine for \$640 from NUTSPRACKER through the Wall Street Market site. Per NUTSPRACKER's instructions on the listings, the UCs provided a shipment address in Queens, New York (the "Queens Address") for the methamphetamine. Upon entering the order for the methamphetamine, the UCs were given an identification number for the transaction and a trade address where Bitcoin should be sent as payment. The UCs were also told a price in Bitcoin based on the exchange rate at the time of the purchase. The UCs

then sent the Bitcoin via the escrow function on Wall Street Market, as requested.

17. On or about September 15, 2018, NUTSPRACKER marked the purchase as sent on Wall Street Market and messaged the UCs, “Thank you for your order. You can expect it to land Monday.” When the package did not arrive as scheduled, the UCs wrote to NUTSPRACKER to inquire about its whereabouts. NUTSPRACKER replied, “Hey, I appreciated your patience and I apologize for the delay. We ran into a couple of unforeseen issues which slowed us down, but have since sorted everything out and immediately shipped your order. You can expect it by Friday. I threw in a few gs to make up for the inconvenience. Thanks again. ”. Based on my training and experience, NUTSPRACKER told the UCs that there had been some shipping delays, but that he had thrown in a few extra grams of methamphetamine into the package at no cost to compensate for the delay.

18. On or about September 26, 2018, NUTSPRACKER provided the UCs with tracking information for the package and confirmed that the package had been sent to the Queens Address (the “Second Package”). On or about September 27, 2018, NUTSPRACKER provided the UCs with additional tracking information indicating that the United States Postal Service (“USPS”) had attempted to deliver the Second Package on September 22, 2018. Because the delivery attempt had been unsuccessful, the Second Package was being returned to NUTSPRACKER.<sup>2</sup>

19. On or about October 2 and 4, 2018, the UCs wrote to NUTSPRACKER

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<sup>2</sup> The DEA later learned that an employee of the store that housed the mailbox associated with the Queens Address had refused the package and returned it to the sender. On or about October 9, 2018, United States Postal Inspection Service officers intercepted the Second Package in San Diego, California and provided it to the DEA.



to inquire about the whereabouts of the methamphetamine. On or about October 5, 2018, NUTSPRACKER replied, “Hey, I’m not ghosting you. I had some technical difficulties that prevented me from signing on for a couple days. I’m looking back into it now, give me a moment please.” Based on my training and experience, I believe the NUTSPRACKER was attempting to track the Second Package and determine its whereabouts before sending an additional methamphetamine package to fulfill the September 12, 2018 order.

20. On or about October 17, 2018, DEA agents received a package at the Queens Address (the “Third Package”). The Third Package had a return address of “Alec Hunter, 8320 Phyllis Pl, San Diego, CA 92123-3850.” A search of the Third Package revealed a false invoice on behalf of “Pacific Harvest” for health foods, similar to the one contained in the First Package. A further search of the box revealed approximately 28 grams of a substance that tested positive for methamphetamine.

Undercover Narcotics Purchase on March 14, 2019

21. On or about March 14, 2019, the UCs purchased 10 grams of methamphetamine for \$225 from NUTSPRACKER through the Wall Street Market website. Per NUTSPRACKER’s instructions on the listing, the UCs provided an address in Brooklyn, New York (the “Brooklyn Address”) for the shipment of the methamphetamine. Upon entering the order for the methamphetamine, the UCs were given an identification number for the transaction and a trade address where Bitcoin should be sent as payment. The UCs were also told a price in Bitcoin based on the exchange rate at the time of the purchase. The UCs then sent the Bitcoin via the escrow function on Wall Street Market, as requested.

22. On or about March 21, 2019, DEA agents received a package at the Brooklyn Address (the “Fourth Package”). The package contained a crystal-like substance

within heat-sealed plastic bags. Law enforcement field tested the substance which returned positive for methamphetamine.

Undercover Narcotics Purchases on March 11, 2020

23. On or about March 11, 2020, the UCs purchased 28 grams of heroin for \$260 from NUTSPRACKER through the Empire Market website. The UCs also purchased 3 grams of heroin for \$217 from NUTSPRACKER through the Empire Market website. Per NUTSPRACKER's instructions on the listing, the UCs provided the Queens Address for the shipment of the methamphetamine and heroin. Upon entering the orders for the methamphetamine and heroin, the UCs were given an identification number for the transactions and a trade address where Bitcoin should be sent as payment. The UCs were also told a price in Bitcoin based on the exchange rate at the time of the purchases. The UCs then sent the Bitcoin via the escrow function on Empire Market, as requested.

24. On or about March 19, 2020, DEA agents received a package at the Brooklyn Address (the "Fifth Package"). The Fifth Package contained a crystal-like substance secreted within several heat-sealed plastic bags. The substances were field tested and returned positive for methamphetamine and heroin.

Undercover Narcotics Purchases on April 15, 2020

25. On or about April 15, 2020 an undercover Federal Bureau of Investigation ("FBI") agent ordered 28 grams of methamphetamine from Nutspracker on the Empire Market and provided an address in the Eastern District of New York. On or about April 27, 2020, the DEA received a crystal-like substance in the Eastern District of New York.

26. Inside the package was a heat-sealed foil bag. Inside the heat-sealed

bag was a heat-sealed piece of plastic. Inside the heat-sealed plastic was another piece of heat-sealed plastic. Inside that heat-sealed plastic was a clear plastic bag that contained a crystal-like substance. The crystal-like substance field tested positive for methamphetamine.

27. The aforementioned narcotics were shipped via U.S. Postal Service Priority Mail envelopes from San Diego, California, to the Eastern District of New York. The envelopes used various “stealth” methods to conceal the illegal narcotics to deter law enforcement efforts from determining the contents of the package.

The DEA Identifies NUTSPRACKER as TRAVIS LINDSEY

28. On or about July 20, 2017, Dutch law enforcement authorities seized computer servers that were used to operate the Hansa market, a now-defunct dark web marketplace. Records obtained from the Hansa servers indicated that NUTSPRACKER was also a narcotics vendor on Hansa. The Hansa records further indicated that NUTSPRACKER listed a Bitcoin wallet ending in “xxMq” as an address where he could receive funds (the “xxMq Wallet”). A search of publicly-available Bitcoin blockchain records revealed that on or about February 25, 2017, the xxMq Wallet and another Bitcoin wallet ending in “XnJ3” (the “XnJ3 Wallet”) received Bitcoin from a single transaction. Based on my training and experience, I believe that a single person (or group of persons working together) controlled the xxMQ Wallet and the XnJ3 Wallet.

29. On or about April 15, 2017, the XnJ3 Wallet sent approximately 0.009673 Bitcoin to a Bitcoin payment processor. Records obtained from the Bitcoin payment processor revealed that the user of the XnJ3 Wallet had provided a Gmail email address “preschoolprowler@gmail.com” as contact information for the account. Records

obtained from Google, Inc. for the preschoolprowler@gmail.com account revealed that telephone number (619) 709-9720 was listed as a recovery telephone number for the account when it was established on September 1, 2015. Records obtained from AT&T revealed that the registered user of the above-listed telephone number on September 1, 2015 was TRAVIS LINDSAY, 5055 Collwood Blvd, Unit 213, San Diego, California 92115.

30. The records further revealed that the Bitcoin payment processor account had been accessed using an IP address ending in 254. Records obtained from an internet service provider revealed that the IP address ending in 254 was registered to TRAVIS LINDSEY at 5055 Collwood Blvd., Unit 213, San Diego, California, 92115.

31. Having identified TRAVIS LINDSEY as “Nutspracker,” law enforcement agents conducted open-source database searches regarding LINDSEY and discovered that his current address was 5797 Mission Center Road, Apartment 201, San Diego, CA 92108.

32. Law enforcement agents confirmed that TRAVIS LINDSEY resided at the 5797 Mission Center Road, Apartment 201 address through surveillance as well as a public records check. Additionally, the Department of Motor Vehicles for the State of California confirmed the address as belonging to LINDSEY.

33. On or about June 23, 2020, law enforcement conducted surveillance of TRAVIS LINDSEY’s residence. Law enforcement observed one of LINDSEY’s roommates leave the residence and enter a blue Toyota Camry. A subsequent records check revealed that the vehicle was registered to LINDSEY’s roommate, an individual known to law enforcement. Law enforcement followed the blue Toyota Camry and observed LINDSEY’s roommate exit the vehicle with a black bag and walk towards a blue post office

box. Law enforcement watched the roommate empty the contents of the black bag into the mailbox and then return to the vehicle. Law enforcement maintained constant surveillance of the mailbox until a United States Postal Inspector arrived and retrieved fifteen USPS Priority Mail envelopes from the mailbox that were similar to the packages received from LINDSEY during the undercover purchases from Nutspracker. A search warrant was executed for one of the packages destined for Hawaii and revealed 210 grams of a crystal-like substance packaged similar to the packages received during the undercover purchases. The substance field-tested positive for methamphetamine.

#### The San Diego Search Warrant

34. On July 30, 2021, the Honorable Michael Berg, United States Magistrate Judge for the Southern District of California, authorized a search and seizure warrant for TRAVIS LINDSEY's residence for evidence of the scheme to obtain, package and distribute narcotics through the dark web.

35. On August 3, 2021, law enforcement agents executed that warrant. Pursuant to the warrant, agents uncovered numerous packages containing crystal-like substances totaling approximately two pounds of suspected narcotics. They also discovered a heat-sealing machine and a shipping station for packaging and distributing the narcotics.

36. Following the execution of the warrant, TRAVIS LINDSEY voluntarily spoke to law enforcement agents and stated, in sum and substance and in part, that he is Nutspracker and that his business is selling narcotics, specifically methamphetamine, to individuals through the dark web. He also stated that the narcotics discovered in the apartment pursuant to the search and seizure warrant belonged to him.

37. WHEREFORE, your deponent respectfully requests that the defendant TRAVIS LINDSEY, also known as “NUTSPRACKER,” be dealt with according to law.

*/s/ Allan Liefke*

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ALLAN LIEFKE  
Special Agent  
Drug Enforcement Administration

Sworn to before me telephonically,  
this 4th day of August, 2021

Ramon E. Reyes, Jr.  Digitally signed by Ramon E. Reyes, Jr.  
Date: 2021.08.04 12:27:54 -04'00'

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THE HONORABLE RAMON E. REYES, JR.  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK